TELECOMMUNICATIONS DIVISION STAFF REPORT

December 8, 1998

Subject: Staff responds to the Commission Order in Dockets 97-0192/97-0211.

Summary

This Report is a brief status of the number pooling trial in the 847 NPA.

I. Pooling Numbers

The latest information from the Pooling Administrator, Lockheed Martin, shows that 118 NXX-Xs have been assigned, all but one of which will be activated by the end of the year. This includes the assignment of at least one contaminated block within a rate center from a pool that included no clean blocks. The 118 blocks have been assigned to a total of 11 carriers. Fourteen full NXXs have been added to number pools by the number administrator in order to replenish the available resources in the number pools. Of the 546 blocks in the overall number pool, 467 are clean and 79 are contaminated.

Since the inception of the pooling trial on June 1, 1998, 106 NXX-Xs have been assigned to carriers. The pooling administrator estimates that 78 full NXXs have been saved as a result of the 847 pooling effort. This estimate is based on the number of NXX-Xs assigned as compared to the number of NXXs that would have been assigned had pooling not been in place. The relationship of NXX-Xs assigned to NXXs saved is not a one-to-one relationship. There are two reasons for this. First, a carrier may have made a request for multiple NXX-Xs in a single rate center, for example 2 NXX-Xs. This would result in only a savings of one full NXX. Second, a carrier may have received, as the result of an NXX-X request, an NXX-X that it had originally donated. Therefore, this does not result in the savings of an NXX. The above number relates only to wireline carriers operating in the 847 NPA. Wireless commercial mobile radio services (CMRS) providers were granted an extension until March 31, 2000 to implement LNP.

The number administrator shows 96 NXXs yet unassigned in the 847 NPA. This does not include those NXXs reserved for carriers under the FCC's one code per carrier rule where a carrier pending certification or certified carrier not yet providing service, does not yet have an 847 code. According to the November Commission list of

"Non-incumbent Local Exchange Companies Requesting Certification", there are approximately 74 facilities-based carriers certificated for the 847 NPA, and another 20 certifications pending. At the last industry meeting, the implementation date for the new 224 NPA was moved to April 17, 1999. The industry will continue to meet periodically   as we near that date to discuss the possibility of moving implementation further out if the volume of remaining 847 numbering resources justifies such. Commission Staff will continue its participation in all industry meetings.

II. Number Pooling Trial Difficulties

Carrier Withdrawal from Trial

On October 5, 1998, Staff was notified by Worldcom that it had withdrawn from the 847 number pooling trial for technical considerations.[1] Discussions between Staff and Worldcom indicate that Worldcom foresaw difficulty being able to smoothly transition to the mechanized mode in the time frame called for by the release 1.4 testing schedule discussed later in this document. Staff has been assured that Worldcom is working to clear up its problems. Staff will be notified once this occurs.

Database Capacity & Release 1.4 Testing

The May 6, 1998, Order clarified that number pooling would not be expanded into the 312, 773, 630, and 708 NPAs until the issue of SCP capacity exhaust has been addressed. Progress has been made on this issue. Specifically, on December 17, 1998 testing will begin on release 1.4. Individual carrier testing will conclude February 1, 1999. Following the individual carrier testing, the functionality of Release 1.4 will be tested as part of the 847 trial through the May 1, 1999 trial conclusion. The results of the individual carrier tests through February 1, as well as the subsequent trial period may provide a basis for considering the expansion of number pooling to other Chicago Area Codes.

Release 1.4 is a new software release from Lockheed Martin in its role as Number Portability Administrator. Because development continues on the number portability network, periodic software updates, called releases, are required to be implemented by Lockheed Martin and tested by the carriers involved in number portability. While Release 1.4 has updates for local number portability, it also includes some changes for number pooling. Specifically there are two number pooling changes: 1) a change to allow the Number Portability Administration Center (NPAC) to send carriers' local service management systems (LSMS) information on whether a number is ported or pooled; and 2) a change to allow the NPAC to send carriers' LSMS data on ported and pooled numbers in ranges instead of individually. A key functionality of

---

[1] See attached letter from Worldcom.

Release 1.4 is that it will allow carriers to operate in a mechanized mode where today they operate in a manual mode.

Release 1.4 will be important for carriers wanting to support efficient data representation (EDR). EDR will allow carriers' service control points SCP, the databases carriers use to store routing information on ported and pooled numbers, to also accept data on ported and pooled numbers in ranges instead of individually. Storing numbers in ranges instead of individually will cut down on the capacity used to store numbers with the SCP databases.

SCP capacity exhaust was the reason the Commission did not immediately expand number pooling to the 312, 773, 630, and 708 area codes. This capacity exhaust problem can be minimized or possibly resolved by EDR. At that point, number pooling can safely be expanded beyond the 847 area code. Release 1.4 is the first step in the implementation of EDR. Once LSMS can accept data on ported and pooled numbers in ranges, the next step will be to allow them to pass on the ranges to the SCP databases for storage.

Carrier testing of Release 1.4 will begin on December 17, 1998. The testing will continue until January 28, 1999. Release 1.4 and its associated pooling functionality will be officially implemented in the 847 NPA on February 1, 1999. If the test goes as planned, on February 1, 1999, carriers will be able to load data from their LSMS into their SCP databases in ranges rather than having each number being represented individually in the database. However, some carriers' databases will not then have the capability to store numbers in ranges, and therefore, will experience no capacity savings due to release 1.4.

An important phase of the test begins on January 8, 1999. During this phase carriers will replace all the manually entered data in their data bases with data stored in a mechanized format using Release 1.4. Because of the importance of having all testing carriers working with a static set of data during this process, no carrier will be allowed to activate a thousand block during the testing until five business days after the close of the testing. No activations will be allowed between 1/8/99 and 2/5/99.

After a successful completion of the release 1.4 test, the Commission may begin to address expansion of number pooling to other Chicago NPAs. Because another 45 day report is due prior to that date, Staff will wait until the next report to further update the Commission on the 1.4 testing as well as address some steps which will be required before possible expansion of number pooling. Staff believes a report by the industry on the results of the Release 1.4 testing will be forthcoming following the conclusion of the test.